

## **EXHIBIT W**

**From:** Patti Ayala <payala@hirecounsel.com>  
**Sent:** Friday, March 27, 2020 10:16 AM  
**To:** Andrew Delaney <jdelaneyandrew@gmail.com>  
**Subject:** Next Step -- RE: Follow Up - Andrew Delaney - COVID19

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Hi Andrew,

Following up with you about your recent assignment to our New York office. We have recently reached out to all the reviewers who worked on the project with you in New York to assess their interest in working remotely, if possible, and for suggestions on how our company could help after the project had been suspended due to the COVID-19 outbreak. Unfortunately, remote work for your project – not only in New York but in all other sites as well – is not available at this time. However, we do understand that this assignment ended abruptly so you could not plan for its ending. Although Hire Counsel has already fulfilled any contractual payment obligations to you, because of the unusual circumstances presented by the COVID-19 outbreak, we have decided to offer our reviewers on this project a payment to assist them during this challenging time.

Although we have not heard back from you, we wanted to offer you this same opportunity. If you are interested in learning more, please reach out to Stephanos Zannikos at 1-516-241-4021. Also, while we trust your own professionalism will guide you, we would be remiss if we did not remind you of your legal and ethical non-disclosure obligations with respect to any of the information you received -- which constituted privileged and confidential information belonging to Toyota and WilmerHale -- during this project.

**Patti Ayala**  
Vice President of Human Resources and Administration



708-813-0317 Cell  
312-646-6276 Direct

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**From:** Patti Ayala  
**Sent:** Thursday, March 19, 2020 5:49 PM  
**To:** 'Andrew Delaney' <jdelaneyandrew@gmail.com>  
**Subject:** RE: Follow Up - Andrew Delaney - COVID19

Hi Andrew,

I am emailing you since you would prefer to communicate by email. I understand you had concerns about the coronavirus and I wanted to reach out to discuss them. As you know, the situation with the coronavirus is unprecedented and requires that we all try to work together to navigate the rapidly changing situation. As a result, we are working with all of our clients and our attorneys to develop an appropriate and safe response for everyone involved. This effort has affected not just your project, but almost every project we are working on.

In light of the shifting situation in New York and concerns about the ability to continue the review in-person, the review that you were assigned to was suspended while the feasibility of a remote review for the New York team was considered. As you know, the review concerns highly confidential attorney-client privileged information, and it is of the utmost importance that this confidentiality be maintained, which makes a remote review extremely challenging.

We are sorry for the distress this situation has caused you, and we have been appreciative of your hard work to date.

Realizing that the coronavirus situation has changed everyone's expectations in the short term, feel free to tell us how you think your work situation can be addressed to assist you while the assignment is suspended.

**Patti Ayala**

*Vice President of Human Resources and Administration*



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**From:** Patti Ayala  
**Sent:** Thursday, March 19, 2020 10:05 AM  
**To:** Andrew Delaney <[jdelaneyandrew@gmail.com](mailto:jdelaneyandrew@gmail.com)>  
**Subject:** Follow Up - Andrew Delaney - COVID19

Hi Andrew,

I wanted to follow up on my call yesterday to touch base about your recent assignment at our New York facility. I understand that you were reluctant to speak over the phone. However, as Vice President of Human Resources at Hire Counsel it is important for me to address concerns and issues that employees of the company have about the work environment.

Would it be okay for just you and me to have a call to discuss the recent concerns you voiced about the coronavirus? Your input is important and it would be greatly appreciated.

**Patti Ayala**

*Vice President of Human Resources and Administration*



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